

REMARKS/ARGUMENTS

Applicants have added new claim 11 which is simply claim 3 in independent form with all the limitations set forth in claims 1 and 2.

Applicants request reconsideration of the rejection set forth in the previous Office Action. Claim 1 was rejected as anticipated by the Farrow reference. Applicants would maintain that this is inappropriate for two reasons. The first reason is that the Farrow reference fails to disclose applying seam tape along a membrane adapted for use as a roofing membrane. The second reason is that Farrow fails to teach cutting through the seam tape and the membrane.

The Farrow reference discloses applying pressure sensitive adhesive and a cover sheet to a paper substrate to produce signage for use in grocery stores and the like. It is applicants' contention that the paper substrate disclosed in the Farrow reference is not a sheet of membrane adapted for use as a roofing membrane. This is a very significant limitation for applicants. Such membranes are extremely thick, extremely heavy and difficult to manipulate. They are not like a simple sheet of paper that can be run across equipment with standard rollers and easily handled. Roofing membrane tends to form waves. Manipulating and controlling membrane roofing is totally different from manipulating a web of paper.

Applicants have defined such material in the background portion of the application wherein it says that, "Single-ply membrane sheeting typically used for roofing and pond liner, or the like, incorporate a single-ply polymeric membrane as a water barrier."

Further on in the first paragraph, it indicates that the materials "are adhered together to form a continuous water impervious sheet which covers the roof." This defined material clearly is different from the paper membrane disclosed in the Farrow reference. More particularly, one skilled in the art would know exactly what is meant by a membrane that is suitable for use as a roofing membrane. It must be a very thick material which can be walked upon. It must be totally water impervious and cannot be water soluble in any way. Although there are many different types of polymers that can be used for polymeric membranes, EPDM is one that is typical and those skilled in the art would appreciate all other standard membranes suitable for use as a roofing material such as thermoplastic olefins, polyvinyl chloride, and the like. As this limitation is not disclosed in the Farrow reference, applicants would maintain that the anticipation rejection is inappropriate.

Further, modifying the Farrow reference to arrive at applicants' invention, again, would not be obvious. One skilled in the art would not rely on the teaching of forming signage in sheet form, which can be run through a printer, to applying a seam tape to membrane roofing. The problems are not the same. One can manipulate paper very easily, whereas manipulation and control of membrane roofing is extremely difficult. That is the reason applicants arrived at this invention, because they found it so difficult to precisely align a sheet of seam tape along an edge of the membrane. This would not be a problem with a sheet of paper.

Further, the Farrow reference simply discloses perforating the sheet. It does not disclose cutting through the sheet. The two are very different. Applicants have to cut

through the sheet. Perforating would be totally unacceptable. One could not easily tear a perforated roofing membrane with an applied seam tape. Again, modifying Farrow to cut completely through the material would not be obvious, it would totally defeat the purpose of the Farrow reference. The purpose of the Farrow reference is to form a sheet of material that can be run through a printer. If one cut completely through the perforated area, it would not be of a size that would be suitable for running through typical printers.

Applicants would maintain that one would not use the teachings of any of the secondary references to modify Farrow to arrive at the present invention either. None of these references deal with a situation where a pressure sensitive adhesive tape material cannot be applied easily to an edge of the material. In all of the references, the substrates are thin, easily handled material. Applying a tape, or the like, to the edge of such materials is extremely simple. That is just the opposite for the membrane roofing.

Again, this all comes down to whether the limitation in claim 1 of a sheet of membrane adapted for use as a roofing membrane is considered in the rejection. As applicants have indicated, the material is defined as a water impervious sheet suitable for use to cover a roof. One skilled in the art would realize that this material is a specifically defined material, well known to those skilled in the art. It is certainly different from the

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paper disclosed in the Farrow reference, or the thin plastics disclosed in the secondary references. As such, applicants would request that the Examiner consider this limitation and allow the pending claims.

Respectfully submitted

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